

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Proposed Intervenors.

**PLAINTIFFS' EXPEDITED INTERROGATORIES TO  
DEFENDANTS NOEM AND LYONS**

Pursuant to Fed. R. Civ. P. 33, Plaintiffs Friends of the Everglades, Inc., and Center for Biological Diversity (collectively, "Plaintiffs"), through undersigned counsel, hereby serves the following set of interrogatories upon Defendant Kristi Noem, in her official capacity as Secretary of the U.S. Department of Homeland Security, and Defendant Todd Lyons, as Acting Director of

United States Immigration and Customs Enforcement, to be answered in writing and under oath within seven (7) days from the date of service.

Respectfully submitted,

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*Counsel for Center for Biological Diversity*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 23, 2025, I served the foregoing document via Electronic Mail on all counsel of record identified below.

s/ Paul J. Schwiep

Service List	
<p><b>Nathan A. Forrester</b> Chief Deputy Solicitor General <a href="mailto:nathan.forrester@myfloridalegal.com">nathan.forrester@myfloridalegal.com</a></p> <p><b>Robert S. Schenck</b> Assistant Solicitor General <a href="mailto:robert.schenck@myfloridalegal.com">robert.schenck@myfloridalegal.com</a> Office of the Attorney General The Capitol, PL-01 Tallahassee, Florida 32399-1050 Telephone: (850) 414-3300 <a href="mailto:jenna.hodges@myfloridalegal.com">jenna.hodges@myfloridalegal.com</a></p> <hr/> <p>BOIES SCHILLER FLEXNER LLP <b>Jesse Panuccio, Esq.</b> <a href="mailto:jpanuccio@bsflfp.com">jpanuccio@bsflfp.com</a> <b>Evan Ezray, Esq.</b> <a href="mailto:eezray@bsflfp.com">eezray@bsflfp.com</a> 401 East Las Olas Boulevard, Suite 1200 Fort Lauderdale, Florida 33301 Telephone: (954) 356-0011</p> <p><i>Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management</i></p>	<p>HAYDEN P. O'BYRNE United States Attorney <b>Carlos J. Raurell</b> Assistant U.S. Attorney <a href="mailto:carlos.raurell@usdoj.gov">carlos.raurell@usdoj.gov</a> 99 Northeast 4<sup>th</sup> Street Miami, Florida 33132 Telephone: (305) 961-9243 <a href="mailto:melissa.Jiminson@usdoj.gov">melissa.Jiminson@usdoj.gov</a></p> <hr/> <p>ADAM R.F. GUSTAFSON Acting Assistant Attorney General Environment and Natural Resources Division United States Department of Justice <b>Peter M. Torstensen, Jr.</b> Deputy Assistant Attorney General Environment and Natural Resources Division United States Department of Justice <b>Hayley A. Carpenter</b> Trial Attorney <a href="mailto:hayley.carpenter@usdoj.gov">hayley.carpenter@usdoj.gov</a> Natural Resources Section Ben Franklin Station P.O. Box 7611 Washington, D.C. 20044-7611 Telephone: (202) 305-0242</p> <p><i>Counsel for Kristi Noem, in her official capacity as Secretary, United States Department of Homeland Security, and Todd Lyons, in his official capacity as Acting Director, United States Immigration and Customs Enforcement</i></p>

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### **INTERROGATORIES**

1. Identify by name and address the person answering these interrogatories and, if applicable, the person's official position or relationship with the party or parties to which the interrogatories are directed.

**Response:**

2. Please identify any agreements, formal or informal, oral or written, between the U.S. Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"), the Federal Emergency Management Agency ("FEMA"), U.S. Customs and Border Protection ("CBP") or any other federal agency or department and the Florida Division of Emergency Management ("FDEM") or any other Florida agency or department (including the Florida National Guard, the Florida Highway Patrol and the Florida Department of Law Enforcement) and regarding or relating to the use of the Dade-Collier Training and Transition Airport ("TNT site") as a detention center or the funding or reimbursement of its construction or operation, and state (1) the terms of any such agreement(s); (2) any agreed sources of funding for the construction of the detention center or the costs of housing detainees; and (3) any supervision, approval or supervision of the detention center or its detainees provided by DHS, ICE, FEMA, CBP.

**Response:**

3. Please state the number of detainees transported to the TNT site by DHS, ICE, CBP or any other federal law enforcement agency since July 1, 2025.

**Response:**

4. Please state the number of detainees transported to the TNT site from the Krome Detention Center, the Broward Transitional Center or the Federal Detention Center located at 33 N.E. 4th Street, Miami, Florida since July 1, 2025, and identify which government agency transported these detainees and at whose direction they were transported.

**Response:**

5. Please state the number of detainees transported from the TNT site to the Krome Detention Center, the Broward Transitional Center or the Federal Detention Center located at 33

N.E. 4th Street, Miami, Florida since July 1, 2025; which government agency transported these detainees; the reason detainees are transported to these facilities; and at whose direction they were transported.

**Response:**

6. Please state the number of detainees taken into custody outside of Florida prior to their transfer to the TNT site.

**Response:**

7. Please state whether the detention center at the TNT Site is being operated pursuant to a Section 287(g) Agreement with DHS, ICE or any other federal agency.

**Response:**

8. Please state whether the detention center at the TNT Site is being operated pursuant to any Intergovernmental Service Agreement (“IGSA”), Memorandum of Understanding, or the like, among FDEM, the Florida National Guard, the Florida Highway Patrol or the Florida Department of Law Enforcement, and ICE, DHS, CBP, FEMA or any other federal agency, and if so, identify the agencies who are parties to that agreement.

**Response:**

9. Please state the total number of detainees at the TNT site as of the date of the response to this Interrogatory. Of these detainees, please state the number of detainees being held pursuant to pending immigration charges. Of those detainees being held pursuant to pending immigration charges, please state the number of detainees being held pursuant to a final order of removal. For any remaining detainees not being held pursuant to immigration charges, if any, please state the legal basis for their detention.

**Response:**

10. Please state whether any Federal agency or department has performed or contributed to any evaluation of the environmental impacts of the operation of the TNT site as a detention center, including any impacts on endangered or threatened species or sensitive ecosystems including surrounding wetlands. If so, please identify and describe any such study, review or analysis.

**Response:**

11. Please state whether any State agency or department has performed or contributed to any evaluation of the environmental impacts of the operation of the TNT site as a detention center, including any impacts on endangered or threatened species or sensitive ecosystems including surrounding wetlands. If so, please identify and describe any such study, review or analysis.

**Response:**

12. Please identify any and all communications (whether oral or written, via state or personal devices) between FDEM or any other State agency or department and DHS, ICE, FEMA or CBP regarding or relating to the construction, operation, funding or reimbursement of expenditures of the detention center at the TNT site, and specifically state: (1) whether the communication was oral or in writing; (2) for written communications, what media or application was used for the communication (i.e., email, WhatsApp message, Facebook chat, Signal, etc.); (3) for oral communications, whether the communication was made in person or by phone or videoconference; (4) for oral communications, whether a memo or email was prepared summarizing or otherwise documenting the communications, and if so, by whom; (5) the name and title of each officer, representative or agent of DHS, ICE, FEMA or CBP with whom FDEM communicated or who attended such conversation; (6) the date of the communication; and (7) the subject matter of the communication.

**Response:**

13. Please identify and describe any protocols discussed between FDEM, the Florida National Guard, the Florida Highway Patrol or the Florida Department of Law Enforcement and DHS, ICE, FEMA or CBP regarding or relating to the operation of the TNT site and the detention of individuals on the Site.

**Response:**



**JURAT**

I have read the foregoing Answers to Interrogatories and do swear that they are true and correct of the best of my knowledge and belief.

\_\_\_\_\_  
XXXXXX

STATE OF FLORIDA                    )  
  ) ss:  
COUNTY OF LEON                    )

**BEFORE ME**, an officer duly authorized in the State aforesaid to take acknowledgements, personally appeared \_\_\_\_\_, who is personally known to me or who has provided the following identification \_\_\_\_\_, and that he did so in his free act and deed for the uses and purposes therein expressed and that he did take an oath.

**SWORN TO AND SUBSCRIBED** before me this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
Notary Public, State of Florida  
Printed Name: \_\_\_\_\_  
My Commission Expires: \_\_\_\_\_